

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**Sean J. Willey**

**Debtors**

**MidFirst Bank**

**Movant**

**v.**

**Sean J. Willey**

**Debtor(s)**

**Tina M. Kaltreider**

**Co-Debtor**

**Scott F. Waterman**

**Trustee**

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**Case No.: 19-14225 PMM  
Chapter 13**

**11 U.S.C. 362**

**ANSWER TO A MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

**AND NOW** comes the Debtor, by his Attorney **Thomas W. Fleckenstein** and files the within **Answer to the Motion for Relief from the Automatic Stay**:

**1.-5. ADMITTED.**

**6.-10. DENIED.** Strict proof of this allegation is demanded at time of trial.

**WHEREFORE**, the Debtor herein, respectfully prays that this Honorable Court deny the Motion for Relief from the Automatic Stay.

***RESPECTFULLY SUBMITTED:***

**DATE:** May 18, 2022

/s/ Thomas W. Fleckenstein  
Thomas W. Fleckenstein, ESQUIRE  
Attorney I.D. No. 307390  
470 Locust Street  
Columbia, PA 17512  
(717) 333-4053